1 William J. Robinson (State Bar No. 83729) email: wrobinson@foley.com 2 Jean-Paul Ciardullo (State Bar No. 284170) email: jciardullo@foley.com 3 FOLEY & LARDNER LLP 555 South Flower Street, Suite 3500 Los Angeles, CA 90071-2411 Telephone: 213-972-4500 4 5 213-486-0065 Facsimile: 6 Attorneys for **Toyo Tire & Rubber Co., Ltd**. and Toyo Tire U.S.A. Corp. 7 8 UNITED STATES DISTRICT COURT 9 CENTRAL DISTRICT OF CALIFORNIA 10 **SOUTHERN DIVISION** 11 **Case No: 8:15-sacy-00246-DOC (DFMx)** TOYO TIRE & RUBBER CO., LTD., a 12 Japanese corporation, and TOYO TIRE U.S.A. CORP., a California corporation, PLAINTIFFS' REQUEST TO CLERK 13 TO ENTER DEFAULTS OF HONG Plaintiffs, KONG TRI-ACE TIRE CO., LTD., 14 AND JINLIN MA V. 15 CIA WHEEL GROUP, a California Corporation, DOUBLESTAR DONG 16 FENG TYRE CO., LTD., a Chinese corporation, QINGDAO DOUBLESTAR TIRE INDUSTRIAL CO, LTD., a Chinese 17 18 corporation, DOUBLESTAR GROUP CORP., a Chinese corporation, HONG 19 KONG TRI-ACE TIRE CO., LTD., a Chinese corporation; and **JINLIN MA**, an 20 individual. 21 Defendants. 22 23 24 25 26 27 28

Plaintiffs, TOYO TIRE & RUBBER CO., LTD., a Japanese corporation, and TOYO TIRE U.S.A. CORP., a California corporation, hereby request the Clerk to enter the defaults of Defendants **HONG KONG TRI-ACE TIRE CO., LTD.**, a Chinese corporation, and **JINLIN MA**, an individual. They were each served on March 28, 2016 as per the Proof of Service filed with the Court (Dkt. 110) on April 13, 2016. The Court expressly recognized that service in its Order of April 13, 2016 (Dkt. 111), wherein the Court stated:

On April 13, 2016, Plaintiffs filed a declaration informing the Court that Defendants Jinlin Ma ("Ma") and Hong Kong Tri-Ace Tire Co., Ltd. ("HKTA") have been served by email pursuant to the Court's March 25, 2016 Order. See Declaration of William J. Robinson ("Robinson Decl.") (Dkt. 110).

More than 21 days have now passed without Hong Kong Tri-Ace Tire Co., Ltd., or Jinlin Ma serving an answer or otherwise responding to the First Amended Complaint.

Dated: May 25, 2016

/S/ WILLIAM J. ROBINSON
William J. Robinson
FOLEY & LARDNER LLP

Attorneys for Toyo Tire & Rubber Co., Ltd. and Toyo Tire U.S.A. Corp.